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### UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:	)	Chapter 11
	)	1
VOYAGER DIGITAL HOLDINGS, INC., et al.,1	)	Case No. 22-10943 (MEW)
Debtors.	)	(Jointly Administered)

#### NOTICE OF FILING OF FIRST AMENDMENT TO ASSET PURCHASE AGREEMENT

PLEASE TAKE NOTICE that on December 18, 2022, Voyager Digital, LLC, as seller, and BAM Trading Services Inc. d/b/a Binance.US). as, purchaser ("Binance,US") entered into that certain asset purchase agreement (the "Initial Asset Purchase Agreement"). The Initial Asset Purchase Agreement was filed with the United States Bankruptcy Court for the Southern District of New York as Exhibit B to the Debtors' Motion for Entry of An Order (I) Authorizing Entry Into the Binance US Purchase Agreement and (II) Granting Related Relief [Docket No. 775].

PLEASE TAKE FURTHER NOTICE that on January 8, 2023, the Voyager Digital, LLC and Binance.US entered into the first amendment to the Asset Purchase Agreement [Docket No. 835] (the "First Amended APA").

The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Voyager Digital Holdings, Inc. (7687); Voyager Digital Ltd. (7224); and Voyager Digital, LLC (8013). The location of the Debtors' principal place of business is 33 Irving Place, Suite 3060, New York, NY 10003.

PLEASE TAKE FURTHER NOTICE that on the January 13, 2023, the Court entered the Order (I) Authorizing Entry Into the Binance US Purchase Agreement and (II) Granting Related Relief [Docket No. 860] (the "APA Order").

PLEASE TAKE FURTHER NOTICE that the Debtors hereby file the Side Letter to the First Amended Asset Purchase Agreement entered into by Voyager Digital, LLC, Binance.US, and counsel to the Official Committee of Unsecured Creditors, attached hereto as Exhibit A.

PLEASE TAKE FURTHER NOTICE that copies of the APA Motion, the First Amended APA, the APA Order, and other pleadings filed in the above-captioned chapter 11 cases may be obtained free of charge by visiting the website of Stretto at <a href="http://www.cases.stretto.com/Voyager">http://www.cases.stretto.com/Voyager</a>. You may also obtain copies of any pleadings by visiting the Court's website at <a href="http://www.nysb.uscourts.gov">http://www.nysb.uscourts.gov</a> in accordance with the procedures and fees set forth therein.

[Remainder of page intentionally left blank]

Dated: March 1, 2023 New York, New York /s/ Joshua A. Sussberg

### KIRKLAND & ELLIS LLP KIRKLAND & ELLIS INTERNATIONAL LLP

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Counsel to the Debtors and Debtors in Possession

### **EXHIBIT A**

**Side Letter to the First Amended APA** 

March 1, 2023

#### SIDE LETTER AGREEMENT

#### **VIA EMAIL**

BAM Trading Services, Inc. d/b/a Binance.US c/o Adam J. Goldberg
Latham & Watkins LLP
1271 Avenue of the Americas
New York, NY 10020
Email: adam.goldberg@lw.com

Voyager Digital, LLC
Stephen Ehrlich
David Brosgol
33 Irving Place, 3rd Floor
New York, NY 10003
Email: sehrlich@investvoyager.cc

Email: sehrlich@investvoyager.com Email: dbrosgol@investvoyager.com

Re: In re Voyager Digital Holdings, Inc., et al. (Case No. 22-10943 (MEW)), First Amended Asset Purchase Agreement, dated January 8, 2023

Purchaser and Seller:

Reference is made to that certain First Amended Asset Purchase Agreement, dated January 8, 2023, attached as **Exhibit A** to the Notice of Filing of First Amendment to Asset Purchase Agreement [Docket No. 835] (as amended, restated or otherwise modified from time to time, including pursuant to this Agreement, the "APA")<sup>1</sup> filed in the above-captioned chapter 11 cases (the "Bankruptcy Case"). On January 13, 2023, the Bankruptcy Court authorized the Debtors to enter into the APA pursuant to the Order (I) Authorizing Entry into the Binance US Purchase Agreement and (II) Granting Related Relief [Docket No. 860] (the "APA Order").

Pursuant to section 1.1(c) of the APA, Seller agreed to sell certain causes of action to Purchaser, including causes of action that Seller may have against any User... solely to the extent that such ... cause of action is against a User in such Person's capacity as a User..." The APA, however, specifically carves out certain causes of action from the list of Acquired Assets, including "Retained Avoidance Actions," which include, among other actions, "any other such claim, right or cause of action that Purchaser agrees in writing prior to the Closing may be retained by the Debtors."

After entry of the APA Order, the Official Committee of Unsecured Creditors in the Bankruptcy Case (the "Committee") undertook an analysis to identify potential avoidance actions (the

<sup>&</sup>lt;sup>1</sup> Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the APA.

 $<sup>^{2}</sup>$  APA § 1.2(g).

<sup>&</sup>lt;sup>3</sup> APA § 11.1(bbbb).

"Claims") that should be further investigated for the benefit of all creditors. This analysis focused on two parameters, as described below:

- 1. Claims against former Users who had a zero or negative balance as of the Petition Date (*i.e.*, former users who are no longer customers and are not creditors of the Debtors' estates) (the "Former Users").
- 2. Claims against Users who (i) withdrew cryptocurrency or (ii) (A) sold cryptocurrency and (B) withdrew cash totaling greater than \$100,000 in value between June 20, 2022 and the Petition Date (the "\$100k Users").

All claims against the Former Users should be preserved because they have no value to Purchaser given that the Former Users have no balance in their account with the Debtors. In other words, there is no consideration to the Debtors' estates for the release of claims against the Former Users. There are approximately 32,000 Former Users.

All claims against the \$100k Users should be preserved because their sale and/or withdrawal activity suggest that some may have been aware of the Debtors' account freezes or withdrawal limits prior to either going into effect. There are 92 \$100k Users.

This side letter agreement (this "<u>Agreement</u>") hereby confirms that, notwithstanding any provision to the contrary in the APA, Seller and Purchaser, intending to be legally bound, agree as follows:

- 1.) All Claims against the Former Users and the \$100k Users, a schedule of which is attached hereto as **Exhibit 1**, are "Retained Avoidance Actions." For the avoidance of doubt, the parties hereto acknowledge and agree that (a) any property (whether in the form of Cryptocurrency, cash or other non-Cryptocurrency property) recovered by Seller in connection with any Retained Avoidance Action ("Recovered Amounts") may constitute assets to be credited, distributed, liquidated or sold by Purchaser under the APA (including under Section 6.11, Section 6.12 or Section 6.14 of the APA) and the intent of the parties hereto is to treat such property accordingly where applicable in accordance with the APA, and (b) all information and data related to the Former Users and the \$100K Users shall in all events remain and constitute Acquired Information delivered to the Purchaser in accordance with, and subject to the conditions of, the APA.
- 2.) Vermont will not be treated as an Unsupported Jurisdiction for purposes of (a) the distribution of Net Owed Coins to Users that are located in the State of Vermont ("Vermont Users") and of cash to Eligible Creditors that are located in the State of Vermont ("Vermont Creditors"), in each case, pursuant to Section 6.12 of the APA, and (b) any Additional Bankruptcy Distributions that occur prior to the date that is ninety (90) days following the Closing Date (the "Target Date"). With respect to any Additional Bankruptcy Distribution that occurs on or following the Target Date, unless as of the date of such Additional Bankruptcy Distribution Purchaser has received a money transmitter license in Vermont or appropriate no-action relief from the Vermont Department of Financial Regulation (the "VT DFR") allowing Purchaser to make the portions of such Additional Bankruptcy Distributions allocable to Vermont Users and Vermont Creditors, Vermont will be treated as an Unsupported Jurisdiction with respect to such Additional Bankruptcy Distributions

and the process set forth in Section 6.14(d) of APA will be followed with respect to portions of such Additional Bankruptcy Distributions allocable to Vermont Users and Vermont Creditors.

#### 3.) With respect to Vermont Users and Vermont Creditors:

- a. Purchaser shall offer each Vermont User and Vermont Creditor the opportunity, subject to the consummation of the Closing and such Vermont User or Vermont Creditor, as applicable, meeting the requirements of the KYC Procedures and accepting the terms and conditions of the Binance.US Platform, to receive distributions of such Vermont User's Net Owed Coins or a Vermont Creditor's cash distribution (including in respect of Additional Bankruptcy Distributions) pursuant to the APA, through the Binance.US Platform after such distribution has been received by Purchaser from Seller in accordance with Section 6.12 and the other applicable provisions of the APA and the Plan confirmed by the Bankruptcy Court.
- b. Following receipt from Seller of a Vermont User's Acquired User Data (either prior to the Closing in accordance with the opt-in process described in Section 6.6(a) of APA or following the Closing) and provided that such Acquired User Data meets the requirements set forth in the KYC Procedures, Purchaser will create an account on the Binance.US Platform for such Vermont User. Following completion of the KYC Procedures by a Vermont Creditor, Purchaser will create an account on the Binance.US Platform for such Vermont Creditor. For purposes of this Agreement, (i) "Migrated Vermont User" means any Vermont User (x) who has completed the KYC Procedures and accepted the terms and conditions of the Binance.US Platform, and (y) in respect of whom an account on the Binance.US Platform has been opened and Purchaser has received such Vermont User's Net Owed Coins or other applicable distributions from Seller in accordance with the APA and the Plan, and (ii) "Migrated Vermont Creditor" means any Vermont Creditor (x) who has completed the KYC Procedures and accepted the terms and conditions of the Binance.US Platform, and (y) in respect of whom an account on the Binance.US Platform has been opened and Purchaser has received such Vermont Creditor's cash or other applicable distributions from Seller in accordance with the APA and the Plan.
- c. Following receipt from Seller of a Migrated Vermont User's Net Owed Coins or a Migrated Vermont Creditor's cash distribution pursuant to the APA and the Plan, Purchaser will credit such Net Owed Coins, or such Migrated Vermont Creditor's cash, to the account on the Binance.US Platform of such Migrated Vermont User or Migrated Vermont Creditor, as applicable, in accordance with and subject to the provisions of the APA and the Plan. Following receipt from Seller of an Additional Bankruptcy Distribution pursuant to Section 6.14 of the APA and the Plan that occurs prior to the Target Date, Purchaser will credit the accounts of each Migrated Vermont User or Migrated Vermont Creditor, as applicable, with the applicable amounts in accordance with and subject to the provisions of Section 6.14 of the APA and the Plan.

- d. After receipt by Purchaser of the distribution by Seller to Purchaser of a Migrated Vermont User's or a Migrated Vermont Creditor's Cryptocurrency or cash or other assets pursuant to the APA and the Plan ("Seller Distribution"), Purchaser will allow Migrated Vermont Users and Migrated Vermont Creditors to access the following features of the Binance.US Platform (among other administrative activities in connection with such features) until the Target Date (in each case, subject to the terms and conditions of the Binance.US Platform):
  - i. review their Cryptocurrency or cash, as applicable, as allocated to their accounts in accordance with APA;
  - ii. exchange Cryptocurrency for other types of Cryptocurrency that are available on the Binance.US Platform;
  - iii. liquidate Cryptocurrency in exchange for United States Dollars;
  - iv. withdraw United States Dollars; and
  - v. withdraw Cryptocurrency to an external wallet.

Without limiting the forgoing, in no event shall Purchaser:

- (A) Provide money transmission services to any person residing in the State of Vermont, except for Vermont Users and Vermont Creditors or their applicable successors or assigns.
- (B) Allow any Vermont User or Vermont Creditor to deposit or transfer additional Cryptocurrency, United States Dollars, or any other assets or funds to Purchaser or onto the Binance.US Platform, other than Seller Distributions and Additional Bankruptcy Distributions in accordance with the APA and the Plan confirmed by the Bankruptcy Court.
- (C) Allow any Vermont User or Vermont Creditor to participate or invest in Cryptocurrency staking through the Binance.US Platform, including without limitation any staking-related services offered by or through Purchaser.
- (D) Invest, sell, lend, stake, arrange for staking, pledge, repledge, hypothecate, rehypothecate or otherwise transfer or use any Cryptocurrency held on behalf of or credited to the account on the Binance.US Platform of any Vermont User or Vermont Creditor (except for any trades, exchanges, liquidations or withdrawals directed by the applicable Vermont User or Vermont Creditor as described above in this Section 3(d)).
- e. Purchaser will freeze all trading and liquidation functionality for accounts of Migrated Vermont Users and Migrated Vermont Creditors on the Binance.US Platform (as described in Sections 3(d)(ii) and (iii) of this Agreement) by the close of business on the Target Date and will follow its standard account closure

procedures (or such other reasonable procedures as may be proposed by Purchaser and consented to in writing by the VT DFR) with respect to Migrated Vermont Users and Migrated Vermont Creditors who contact Purchaser to close their accounts on the Binance.US Platform. Purchaser shall use its commercially reasonable efforts to complete the return of all outstanding account assets or cash proceeds thereof of Migrated Vermont Users and Migrated Vermont Creditors on the Binance.US Platform to the applicable Migrated Vermont Users and Migrated Vermont Creditors as contemplated by the immediately preceding sentence within 60 days after the Target Date. Purchaser will notify Vermont Users and Vermont Creditors on or promptly following the Closing Date of the account functionality and limitations that Vermont Users and Vermont Creditors will be able to access (as described in Section 3(d) of this Agreement), together with the freeze described in the immediately preceding sentence and the timing thereof Purchaser will resend such notice to Vermont Users and Vermont Creditors (i) 30 days following the Closing Date, (ii) 60 days following the Closing Date and (iii) 10 days prior to the Target Date.

4.) Any cash or non-Cryptocurrency property payable to Users or Eligible Creditors under the Plan will first be transferred from Seller to Purchaser for further distribution by Purchaser to Users or Eligible Creditors, as applicable. Such transfers will be made following the satisfaction of the KYC Procedures by such Users or Eligible Creditors completing the KYC Procedures and accepting the Binance.US Platform terms and conditions and the opening of accounts on the Binance.US Platform for such Users or Eligible Creditors, as applicable, as part of the account migration process described in the APA. Purchaser would act in the capacity of Distribution Agent (as defined in the Plan) to distribute any such property transferred from Seller to Purchaser (subject to the other terms of the APA relating to Purchaser's rights to act as Distribution Agent). For purposes of the APA, any such transfers and further distribution will be governed by, and occur in accordance with and subject to the terms and conditions of, the APA that apply to the transfers by Seller to Purchaser and subsequent distribution of Net Owed Coins or cash, as applicable, mutatis mutandis (i.e., such transfers would be made in the same cadence as how Net Owed Coins are transferred by Seller to Purchaser under the APA and subject to the provisions relating to Unsupported Jurisdictions). For the avoidance of doubt, such transfers by Seller to Purchaser and further distributions by Purchaser described in this Section 4 shall not include Additional Bankruptcy Distributions.

The Purchaser is currently negotiating a no-action letter (the "No-Action Letter") and a Memorandum of Understanding (the "MOU") with VT DFR which would permit Purchaser to conduct the activities described in Sections 2 and 3 of this Agreement. The Parties acknowledge and agree that Sections 2 and 3 of this Agreement shall become effective upon, but not prior to, the execution of the No-Action Letter and the MOU.

Purchaser and Seller represent and warrant that they have the authority to enter into this Agreement and have obtained any consents necessary to effectuate the provisions set forth herein.

Purchaser and Seller acknowledge that if the APA is amended after the date hereof in a fashion that results in certain section references herein to no longer reference the intended sections thereof,

that this Agreement shall be promptly (and, in any case, to be effective as of the effectiveness of such amendment) amended to reference the intended sections of the APA.

Sections 10.2 through 10.9 and 10.13 through 10.17 of the Agreement are hereby incorporated by reference and apply to this Agreement, *mutatis mutandis*.

To the extent anything in this Agreement is inconsistent with the APA, the undersigned parties agree that this Agreement shall govern.

Respectfully,

Darren Azman (dazman@mwe.com)
McDermott Will & Emery LLP
One Vanderbilt Avenue New York, NY 10017
Counsel to the Committee

cc: Norman Reed (norman.reed@binance.us and legal@binance.us)

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[Signature Page to Follow]

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If the above correctly reflects your understanding and agreement with respect to the foregoing matters, please execute this Agreement in the space provided below to indicate your acceptance and agreement to the terms hereof, to be duly executed and delivered as of the date first above written.

<b>BAM TRADING SERVICES</b>	INC.
D/B/A BINANCE.US	

By: Brian Shroder

Name: Brian Shroder

Title: Chief Executive Officer

### **VOYAGER DIGITAL, LLC**

By:\_\_\_\_\_

Name: Stephen Ehrlich

Title: Chief Executive Officer

If the above correctly reflects your understanding and agreement with respect to the foregoing matters, please execute this Agreement in the space provided below to indicate your acceptance and agreement to the terms hereof, to be duly executed and delivered as of the date first above written.

BAM TRADING SERVICES INC.
D/B/A BINANCE.US

By	•

Name: Brian Shroder

Title: Chief Executive Officer

#### **VOYAGER DIGITAL, LLC**

By: Stew Eurich
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Name: Stephen Ehrlich

Title: Chief Executive Officer

### EXHIBIT 1

## 22-10943-mew Doc 1126 Filed 03/01/23 Entered 03/01/23 22:56:01 Main Document Pg 14 of 127

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## 1960/126 Gold ## 0971-189854609   007003-19007-1909-1909-1909-1909-1909-1909-190					
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9145962-3686-488-5189-28981 14159 c) deb6127-176-163-469-e4f5248568 / 7/369-281-18159 c) deb6127-1815-4815-69-2815969 (2) deb622-368-519-89-2816-880 (2) deb624-477-e462-519-52-294596 (2) deb623-24-776-642-181-6-7777-85556 (2) deb623-24-775-642-181-818-485-648-487-885-78-885-	9139fbfb-ea47-4d1d-8128-7bc5b3650c2e	cb219e33-d536-4b43-8f0a-56e7846c1c17	7d76dde6-ab8f-401d-8dec-9742d8452a06	20c0d984-0def-49a3-84f3-0bc5b2c0a492	768f47a4-1ac3-40e8-a819-b1acd0c83e58
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